#### IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PENNSYLVANIA

Galaxy International PurchasinG, LLC

VS.

CIVIL ACTION

Plaintiff

Original 5 May 2021

**BRUCE CLARK** 

NO: 20-07251

Defendant

#### TEN DAY NOTICE OF INTENT TO TAKE DEFAULT JUDGMENT

To:

Bruce Clark

133 Skyline Dr

New Holland Pa 17557

Date of Notice: April 30, 2021

#### IMPORTANT NOTICE PURSUANT TO PA.R.C.P. 237.1(a)(2)

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

> Lancaster Bar Association Lawyer Referral Service 28 East Orange Street Lancaster, PA 17602 717/393-0737

#### IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PENNSYLVANIA

Galaxy International PurchasinG, LLC

CIVIL ACTION

Plaintiff

SCAN of Original 5 May 2021

VS.

BRUCE CLARK

NO: 20-07251

Defendant

.....

#### CERTIFICATE OF SERVICE

I, Robert F. Jordan, hereby certify that on April 30, 2021 I served a copy of the Ten Day

Notice of Intent to Take Default in the above captioned matter by mailing the same via First

Class United States mail, postage prepaid addressed as follows:

Bruce Clark 133 Skyline Dr New Holland Pa 17557

Ratchford Law Group, P.C.

Appears to be missing the word JUDGEMENT.

Michael F. Ratchford, Esq.

PA Supreme Court ID #: 86285

Robert F. Jordan

PA Supreme Court ID #: 208153

Attorney for Plaintiff

Ratchford Law Group, P.C.

54 Glenmaura National Blvd. Suite 104

Moosic, PA 18507

Phone: (570) 558-5510

Email: rjordan@ratchforlawgroup.com

Fax: (570) 558-5511

### IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PENNSYLVANIA

Galaxy International PurchasinG, LLC

CIVIL ACTION

Demandante

SCAN of Original 5 May 2021

VS.

NO: 20-07251

**BRUCE CLARK** 

Acusado

.

#### **AVISO IMPORTANTE**

A: Bruce Clark

133 Skyline Dr New Holland Pa 17557

FECHA DEL AVISO: April 30, 2021

#### IMPORTANT NOTICE PURSUANT TO PA.R.C.P. 237.1(a)(2)

USTED ESTA EN REBELDIA PORQUE HA FALLADO DE REGISTRAR COMPARECENCIA ESCRITA POR SI MISMO O A TRAVES DE UN ABOGADO Y SOMETER CON LA CORTE SUS DEFENSAS U OBJECCIONES A LOS CARGOS QUE SE HAN PRESENTADO CONTRA USTED. A MENOS QUE USTED ACTUE DENTRO DE DIEZ DIAS DE HABER RECIBIDO ESTE AVISO, LA CORTE PUEDE TOMAR UNA DECISION EN CONTRA SUYA SIN TENER DERECHOS A UNA VISTA Y USTED PUEDE PERDER SU PROPIEDAD U ORTOS DERECHOS IMPORTANTES.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE UN ABOGADO, LLAME O VAYA A LA SIGUIENTE OFICINA. ESTA OFICINA PUEDE PROVEERLE INFORMACION A CERCA DE COMO CONSEGUIR UN ABOGADO.

SI USTED NOPUEDE PAGAR POR LOS SERVICIOS DE UN ABOGADO, ES POSIBLE QUE ESTA OFICINA LE PUEDA PROVEER INFORMACION SOBRE. AGENCIAS QUE OFREZCAN SERVICIOS LEGALES SIN CARGO O BAJO COSTO A PERSONAS QUE CUALIFICAN.

> Lancaster Bar Association Lawyer Referral Service 28 East Orange Street Lancaster, PA 17602 717/393-0737

Case 5:21-cv-03358-JFL Document 1-1 Filled 07/26/21 Page 4 of 16

54 Glenmaura National Blvd. Suite 104 Moosic, PA 18507 (P) 800-503-1665 (F) 570-558-5511

OFFICE HOURS (E.S.T.): Monday to Thursday 8:00AM -6:00PM Friday 8:00AM - 5:00PM



RATCHFORD LAW GROUP, P.C. www.ratchfordlawgroup.com Michael F. Ratchford Erin M. Reczek\* Kate E. Conley\*\* \* Licensed in MA, ME, NH, & VT \*\*Licensed in ME & NH

April 30, 2021

SCAN of Original 5 May 2021

Bruce Clark 133 Skyline Dr New Holland Pa 17557

Re:

Galaxy International PurchasinG, LLC vs BRUCE CLARK

Lancaster County Civil Action No.: 20-07251

Our file No.: CA191655/RFJ

Dear Bruce Clark:

and the party of the last

Enclosed, please find the Ten Day Notice of Intent to Take Default in regard to the abovenoted matter. Please act accordingly.

Ratchford Law Group, P.C.,

Appears to be missing the word JUDGEMENT.

Robert F. Jordan

#### Enclosure

This is a communication from a debt collector in an attempt to collect a debt. Any information will be used for that purpose.



Lancaster County, PA
Court of Common Pleas
Case #CI-20-07251

May 7, 2021

UNITED STATES
PRIORITY MAIL

9505 5109 7827 1128 3817 18

In the COURT of COMMON PLEAS of LANCASTER COUNTY, PENNSYLVANIA

Delivered: Monday, 10 May 2021, 08:14 EDT

Galaxy International PurchasinG, LLC

CIVIL ACTION

:

Plaintiff

.

VS.

.

**BRUCE CLARK** 

NO: 20-07251

Defendant

:

## RESPONSE TO NOTICE OF APRIL 30, 2021 LABELED:

#### "TEN DAY NOTICE OF INTENT TO TAKE DEFAULT JUDGEMENT"

I, Bruce L. Clark as the assumed *Consumer Defendant*, declare that there exists no basis for this claim made by the Plaintiff. I have received no prior official or unofficial documentation explaining the claim as made by the Plaintiff's counsel. I must therefore assume that it is fraudulent and that the Plaintiff's counsel (Disciplinary Board of the Supreme Court of Pennsylvania ID #208153) is consciously attempting to aid in unlawfully stealing money or property from me that does not belong either to him or his client.

A formal complaint to the Office of Disciplinary Counsel (ODC) of the Pennsylvania Supreme Court's Disciplinary Board may be in order based upon possibly unlawful or unethical behaviors within the legal system of the Commonwealth of Pennsylvania.

Page 1 of 3



VS.

Bruce L. Clark 133 Skyline Drive New Holland, PA 17557 Lancaster County, PA
Court of Common Pleas
Case #CI-20-07251

May 7, 2021

# In the COURT of COMMON PLEAS of LANCASTER COUNTY, PENNSYLVANIA

Galaxy International PurchasinG, LLC : CIVIL ACTION

Plaintiff

\*

BRUCE CLARK : NO: <u>20-07251</u>

Defendant:

If this case is related to an appeal of the local Pennsylvania Magisterial Court Case #MJ-02306-CV-0000110-2020, which yielded a "verdict for the Defendant," then the Defendant's costs related to and as yet unreimbursed from that proceeding will continue to increase and become the basis for a separate recovery effort since you, as the Plaintiff's counsel for this action, have now been so informed. As of May 7, 2021, those costs will amount to \$2,385.72+ to be reimbursed to the Consumer Defendant, along with a mental stress (harassment) award of \$25,000.00+ related to the Federal Trade Commission (FTC) Fair Debt Collections Practices Act Code 15 U.S.C. §\$1692-1692p, §806 with respect to harassment or abuse imposed in any baseless attempted collection actions.

If not related to the above mentioned resolved case, then the current costs amount to \$317.86+ as of this date to be reimbursed to this *Consumer Defendant*, along with mental stress (harassment) award of \$25,000.00+ related to the Federal Trade Commission (FTC) Fair Debt Collections Practices Act (FDCPA) Code 15 U.S.C. §§1692-1692p, §806 with respect to harassment or abuse imposed in any baseless attempted collection actions.

The following may also be specific violations of the same U.S. Code U.S.C. §1692e, §807 False or misleading representation: ¶4 threatened seizure or sale of property; ¶9 use of written communication that simulates or falsely represents a document authorized,

Page 2 of 3



Lancaster County, PA Court of Common Pleas Case #CI-20-07251

May 7, 2021

# In the COURT of COMMON PLEAS of LANCASTER COUNTY, PENNSYLVANIA

Galaxy International PurchasinG, LLC

CIVIL ACTION

Plaintiff

.

BRUCE CLARK

VS.

NO: 20-07251

Defendant :

issued or approved by any Court which creates a false impression of its source or authorization; and ¶13 false representation that documents are legal process forms. Also, U.S. C. §1692g, §809 Validation of debt: ¶(a) Notice of debt; contents, and ¶(b) Disputed debts; and U.S.C. §1692j, §812 Furnishing certain deceptive forms, both ¶(a) and ¶(b).

These possible Federal Trade Commission (FTC) Fair Debt Collections Practices Act (FDCPA) Code 15 U.S.C. §§1692-1692p violations will be pursued in the United States District Court for the Eastern District of Pennsylvania, since the Plaintiff is registered as a business located in the state of Nevada, USA.

To preclude proactive pursuit of these potential claims against the Plaintiff's counsel, the Plaintiff or its legal counsel must formally withdraw their asserted legal actions from the Court of Common Pleas of Lancaster County, PA identified as CIVIL ACTION NO: 20-07251 within 20 days of receipt of this "formal response" or provide substantiating evidence of a valid claim against the *Consumer Defendant*.

Entered by:

Bruce L. Clark

Bruce L. Clark

Consumer Defendant, Pro Se

May 7, 2021

Date

Page 3 of 3

#### COMMONWEALTH OF PENNSYLVANIA COUNTY OF LANCASTER



#### NOTICE OF JUDGMENT/TRANSCRIPT CIVIL CASE

Mag. Dist. No:

MDJ-02-3-06

MDJ Name:

Honorable Jonathan W. Heisse

Address:

745B East Main Street

New Holland, PA 17557

Telephone:

717-354-4206

Bruce Clark 133 Skyline Drive New Holland, PA 17557 State Farm Bank

Bruce Clark

Docket No:

MJ-02306-CV-0000110-2020

Case Filed:

8/18/2020

ABANDONED ACCOUNT
18 January 2019

Dis	position	Detail	Is
			-

Disposition	Summary	(cc - Cross	Complaint)

Docket NoPlaintiffDefendantDispositionDisposition DateMJ-02306-CV-0000110-2020State Farm BankBruce ClarkJudgment for Defendant09/24/2020

#### Comments:

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS OR THE PHILADELPHIA MUNICIPAL COURT, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS OR THE PHILADELPHIA MUNICIPAL COURT AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS OR THE PHILADELPHIA MUNICIPAL COURT, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

Date

Magisterial District Judge Heisse

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

Date

Magisterial District Judge

The United States of America is a nation of Laws, Truth and Justice.

PARK - Response to GIP, LLC notice of April 30, 2021 Rev 1 (K-L)

7 May 2021



September 29, 2020

# ABANDONED ACCOUNT 18 January 2019

#### To the attention of:

Michael F. Ratchford, Esq. RATCHFORD LAW GROUP, P.C. Suite 104 54 Glenmaura National Boulevard Moosic, PA 18507

COPY

re: Invalid Fraudulent Collections Attempt of State Farm Bank

Unsecured Credit Card account number: 4707 8600 4672 9823

in the name of: Bruce L. Clark 133 Skyline Drive New Holland, PA 17557

Updated defendant's costs as of September 29, 2020:

As of September 18, 2020 Additional costs:	\$872.62	* Costs associated with initial magisterial Court initial magisterial and
Hourly (\$80.00 X 3.25hrs) Postage (PRIORITY MAIL EXPRESS) Mileage	\$260.00 \$26.35 \$11.23	initial magisterns and defense preparation and presentation.
As of September 21, 2020 Hourly (\$80.00 X 2.75hrs)	\$1,170.20 \$220.00	al coots
As of September 23, 2020 Hourly (\$80.00 X 3.50hrs)	\$1,390.20 \$240.00	Accumulation of costs will continue until the appeal is settled.
As of September 29, 2020 Hourly (\$80.00 X 0.75hrs) Postage (CERTIFIED MAIL)	\$1,630.20 \$60.00 \$7.60	appear w
		D 1 -6:

Page 1 of 3

Updated June 28, 2021

# ABANDONED ACCOUNT 18 January 2019

#### To the attention of:

Michael F. Ratchford, Esq.
RATCHFORD LAW GROUP, P.C.
Suite 104
54 Glenmaura National Boulevard
Moosic, PA 18507



re: Invalid Fraudulent Collections Attempt of State Farm Bank
Unsecured Credit Card account number: 4707 8600 4672 9823

Updated defendant's costs as of May 7, 2021:

Mileage	\$11.23	
As of September 21, 2020	\$1,709.03	
Hourly (\$80.00 X 2.50hrs) Postage (CERTIFIED MAIL) Mileage	\$200.00 \$7.60 \$11.23	Accumula
As of November 16, 2020	\$1,927.86	will contin
Hourly (\$80.00 X 1.75hrs)	\$140.00	appeal an
As of November 19, 2020	\$2,067.86	related fo
Hourly (\$80.00 X 3.75hrs) Postage (CERTIFIED MAIL &	\$300.00	actions a
PRIORITY MAIL)	\$26.55	
Mileage	\$10.11	
As of May 7, 2021	\$2,404.52	

Accumulation of costs will continue until the appeal and/or any related follow-up actions are settled.

Page 2 of 3

Updated June 28, 2021

ABANDONED ACCOUNT 18 January 2019

#### To the attention of:

Michael F. Ratchford, Esq. RATCHFORD LAW GROUP, P.C. Suite 104 54 Glenmaura National Boulevard Moosic, PA 18507



re: Invalid Fraudulent Collections Attempt of State Farm Bank previously undisputed, declared abandoned, unsecured Credit Card account number: 4707 8600 4672 9823

Updated defendant's costs as of July 23, 2021:

As of May 7, 2021	\$2,404.52
Hourly (\$80.00 X 5.50hrs)	\$440.00
Postage (CERTIFIED MAIL & PRIORITY MAIL)	\$26.55
Mileage	\$10.11
As of June 28, 2021	\$2,881.18
Hourly (\$86.00 X 5.hrs)	\$430.00
Postage (CERTIFIED MAIL & PRIORITY MAIL)	\$26.55
Mileage	\$10.11
As of July 23, 2021	\$3,347.84

Accumulation of costs will continue until the appeal and/or any related follow-up actions are settled.

Page 3 of 3

Case 5:21-cv-03358-JFL Document 1-1 Filed 07/26/21 Page 12 of 16

State Farm Bank Po Box 2328 Attn: Financial Cards Bloomington, Il 61702-2328



\*

December 12, 2018

133 Skyline Dr New Holland, PA

17557-9354

Your Account Ending In 9823

BALANCE AMT PAST DUE DAYS PASTDUE TOTAL AMOUNT DUE \$7,150.02 \$146.48

\$290.79

Re-18-18

Dear Bruce L Clark:

We want to make you aware that your State Farm(R) Visa(R) credit card account is currently past due. At State Farm Bank(R), we make every attempt to provide you the services you need, however, anytime your account is past due, we may suspend your credit privileges until the required payment is received.

Since we have not received the minimum payment due, we will be attempting to contact you by telephone for the payment. We would like to make payment arrangements with you to prevent your credit privileges from being suspended again. If you prefer, you can call us at 1-888-634-0012 to make your payment by phone.

Sincerely,

Collections Department State Farm Bank Address used for Certified letter of 12-31-2018

State Farm Bank
PO Box 2328
Attn: Financial Cards
Bloomington, II
61702-2328

CREDIT REPORTING: State Farm Bank may report information about your account to credit bureaus, including negative information. Late payments, missed payments, or other defaults on your account may be reflected in your credit report. You authorize State Farm Bank to obtain consumer reports about you until the balance is paid in full and the account is closed.

DISPUTING ACCOUNT INFORMATION REPORTED TO CREDIT BUREAUS: We furnish information about your account to credit bureaus. You have the right to dispute the accuracy of the information reported by writing to us at: State Farm Bank, F.S.B., ATTN: Credit Reporting, P.O. Box 2313, Bloomington, IL 61702-2313.

This is an attempt to collect a debt and any information obtained will be used for that purpose.

REFINANCING ACTION PLAN State Farm Bank 9823

31 December 2018







December 31, 2018

CERTIFIED U.S. MAIL 7018 0680 0001 5832 6579

To the attention of State Farm Bank, PO Box2328, Attn: Financial Cards, Bloomington, Il 61702-2328 re:

Unsecured Credit Card account number: 4707 8600 4672 9823

in the name of: Bruce L. Clark

133 Skyline Drive

New Holland, PA 17557

Copy

With a Balance on 12/10/2018 of \$7,003.33 and a

Current Interest Rate: 12.24 % (fixed) equaling 1.0017 % per month.

Due to financial hardship as managed through *TABOR Community*Services in Lancaster, PA (www.tabornet.org), I am proposing either:

#### a) A payment plan with a:

Cancelled Credit Card with a suggested Interest Rate: 0.00% (Fixed), equaling 0.0000% per month and a renewed payment of approximately \$97.26 per month for 72 months beginning in March of 2019 to be paid either directly by me or through Navicore SOLUTIONS of Freehold, NJ.

OR

#### b) Default on this account.

Please respond in writing with details on record by January 15, 2019 if State Farm Bank is willing to accept proposal  $\underline{a}$ . Failure to provide a response showing a mailing date prior to January 16, 2019 will indicate State Farm Bank's desire to abandon this account (choice  $\underline{b}$ ).

Contact me at the above address to work out details if you choose option a).

January 18, 2019

CERTIFIED U.S. MAIL 7018 0680 0001 5832 6678

To the attention of State Farm Bank, PO Box2328, Attn: Financial Cards, Bloomington, Il 61702-2328 re:

Unsecured Credit Card account number: 4707 8600 4672 9823

in the name of: Bruce L. Clark

133 Skyline Drive

New Holland, PA 17557

ABANDONED ACCOUNT

With a Balance on 12/10/2018 of \$7,003.33 and a

Current Interest Rate: 12.24 % (fixed) equaling 1.0017 % per month.

Due to financial hardship as managed through *TABOR Community*Services in Lancaster, PA, in my letter of December 31, 2018, I proposed either:

#### a) A payment plan with a:

Cancelled Credit Card with a suggested Interest Rate: 0.00% (Fixed), equaling 0.0000% per month and a renewed payment of approximately \$97.26 per month for 72 months beginning in March of 2019 to be paid either directly by me or through Navicore SOLUTIONS of Freehold, NJ.

OR

#### b) Default on this account.

Because of your failure to respond with a documented, traceable acceptance or counteroffer by January 15, 2019, you have taken the position that you are abandoning this account, its balance and the debtor's need to pay "the remaining amount of this disputed account" for all time.



November 19, 2020 Oniginal of 9-30-20 sent & received

CERTIFIED & WIAIL 7019 2280 0002 1688 2952

#### To the attention of:

Michael F. Ratchford, Esq. RATCHFORD LAW GROUP, P.C. Suite 104 54 Glenmaura National Boulevard Moosic, PA 18507

Proposed
Criminal Charges Re:
ABANDONED ACCOUNT
18 January 2019

re: Invalid Fraudulent Collections Attempt of State Farm Bank

<u>Unsecured</u> Credit Card account number: 4707 8600 4672 9823

Consider, if you will, as the agent for State Farm Bank that the following criminal charges may be filed against you personally, since you as a lawyer should have known that it is unlawful to attempt to collect on an abandoned unsecured credit account. I will not file criminal charges against you or report your actions (as a complaint) to the Disciplinary Board of the Supreme Court of PA if you reimburse my costs to date (\$2,067.86) and drop your civil appeal of the JUDGEMENT of MDJ-02-3-06 CV-110-2020.

- criminal misdemeanor fraud related to presentation to the Court of Abandoned State Farm Bank Account #9823 against the victim;
- (2) criminal misdemeanor attempted theft from the victim of almost \$8,000 related to the Civil Case #PA MDJ-02-3-06 CV-110-2020;
- (3) misdemeanor criminal abuse of the victim, leading to a minimum cost to the victim of \$2,067.86 to be reimbursed to the victim, along with a mental stress (harassment) award of \$25,000.00.

Bruce L. Clark
Victim
November 19, 2020

19 November 2020 30 September 2020

CERTIFIED MAIL

20TO 59TC 2000 0822 6TO

OST PRIORITY MAIL AT RATE ENVELOPE AGE REQUIRED

POSTAL SERVICE UNITED STATES

PRIORITY®

MAIL



FROM:





nited international insurance.\*\* PS Tracking® included for domestic and many international de pected delivery date specified for domestic use st domestic shipments include up to \$50 of insurance (restrict

eceive

JUL

26

133 Skyline Drive New Holland, PA

17557-9354

Bruce L. Clark

stic Mail Manual at http://pe.usps.com. ance does not cover certain items. For details regarding claims exclusions see nen used internationally, a customs declaration form is required

International Mail Manual at http://pe.usps.com for availability and limitations

ē.

5

# GAL FLAT RATE ENVELOPE

ONE RATE **ANY WEIGHT** 

# TRACKED INSURED



EP14L May 2020 OD: 15 x 9.5 Legal Flat Rate Envelope

> To schedule free Package Pickup, scan the QR code



USPS.COM/PICKUP

Eastern District of Pennsylvania 601 Market Street, Room 26 Philadelphia, PA 19106-1797 United States District Con James A. Byrne Courthouse